

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

IN RE:)
)
JASON WAYNE THOMAS) Case No. 18-50348-BTF
KATIE RACHEL THOMAS)
Debtor(s).)

**APPLICATION TO RETAIN REAL ESTATE AGENT MARK HARRIS TO MARKET REAL
PROPERTY OF THE ESTATE**

COMES NOW, Bruce E. Strauss, Trustee, and for his motion to retain a real estate agent states and alleges as follows:

1. That the above captioned debtor filed for relief under Chapter 7 of the United states Bankruptcy Code on August 16, 2018.
2. That Bruce E. Strauss is the Chapter 7 panel trustee appointed to administer the assets of this case and continues in that capacity.
3. That the Debtors' bankruptcy estate includes real property located at 436 S. Chestnut Street, Olathe, KS 66061.
4. That the Trustee seeks to employ Mark Harris of ReeceNichols Real Estate to market and sell the property on behalf of the bankruptcy estate.
5. The terms of retention of Mr. Harris and the services which the trustee seeks to have performed are more fully set forth in the Affidavit of Mark Harris which is attached as 'Exhibit A', but generally he is to market and sell the property for the benefit of the estate. The Trustee believes Mr. Harris is a disinterested party who holds no adverse interest to the bankruptcy estate. He is not related to or employed by the United States Trustee or any person employed therein. The commission for the sale of the subject property will be 6%.
6. That the Trustee believes that Mr. Harris' services are essential to obtain the best possible price for the subject property.

WHEREFORE, Bruce E. Strauss, Trustee, prays that this court enter an order approving the retention of Mark Harris and ReeceNichols Real Estate to market and sell the real property described herein for the benefit of this bankruptcy estate, and for such further relief as the court deems just.

MERRICK, BAKER & STRAUSS, P.C.

By: /s/ bruce e. strauss
BRUCE E. STRAUSS MO#26323
1044 Main Street, Suite 500
Kansas City, MO 64105
(816) 221-8855 (816) 221-7886 (FAX)
Email: trustee@merrickbakerstrauss.com

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was served upon all persons requesting Electronic Case Filing (ECF) notification on February 8, 2019.

/s/ bruce e. strauss
BRUCE E. STRAUSS

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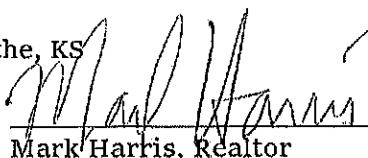
AFFIDAVIT OF MARK HARRIS

I, Mark Harris, being duly sworn, states as follows:

1. That I am a licensed real estate agent in the State of Missouri, and am associated with The Harris Group of ReeceNichols, a Berkshire Hathaway Affiliate, 2140 E. Santa Fe, Olathe, KS 66062.
2. That The Harris Group of ReeceNichols, a Berkshire Hathaway Affiliate is a business organization engaged in the business of real estate consulting and sales in the Cameron, Kansas area.
3. That I have extensive experience in the marketing and selling of properties in this area, and am familiar with the bankruptcy process.
4. That I will actively market real property of the bankruptcy estate and will solicit offers for the purchase of said properties.
5. That as compensation for my services, I and any realtor representing a purchaser will split a commission of 6%. Said fee to be paid at the closing of the sale and shall be subject to prior court approval of allowance of compensation.
6. That neither I, nor The Harris Group of ReeceNichols, a Berkshire Hathaway Affiliate, holds or represents any interest adverse to the estate, and are disinterested persons. That neither I, nor The Harris Group of ReeceNichols, a Berkshire Hathaway Affiliate are aware of any connection to any creditor or other person of interest in this case which might create a conflict of interest.
7. That no agreement has been made or will be made to share any compensation to be paid, except as the officers, employees and partners The Harris Group of ReeceNichols, a Berkshire Hathaway Affiliate and any agent split resulting from the Multi Listing Service.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 8th day of February, 2019 in Olathe, KS



Mark Harris, Realtor

The Harris Group of ReeceNichols, a Berkshire Hathaway Affiliate

EXHIBIT A